

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Brian K. Barnhart,	:	Chapter 13
Debtor	:	
	:	
The Bank of New York Mellon,	:	
F/K/A/ The Bank of New York	:	No. 19-001053
As trustee for registered Holders	:	
Of CWABS, Inc., Asset-Backed	:	
Certificates, Series 2006-23	:	
Movants	:	
Vs.	:	
	:	
Brian K. Barnhart,	:	
Debtor/Respondent	:	
	:	
Charles J. DeHart, III, Esq.	:	
Trustee	:	

**ANSWER OF DEBTOR TO MOTION OF The Bank of New York Mellon, F/K/A/
The Bank of New York as trustee for registered Holders of wABS, Inc., Assest-
Backed Certificates, Series 2006-23 For Relief From The Automatic Stay Under
Section 362**

AND NOW comes your Debtor, Brian K. Barnhart, by and through his counsel, Aaron J. Neuharth, Esquire and Answers Movant's Motion For Relief From Automatic Stay as follows:

1. Admitted. By way of further answer, it is believed by the Debtor that Movant is who they state they are, and that they have the authority to move on behalf of the mortgage company pursuant to their stated Certificate of Trustee.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted. By way of further answer, the debtor has submitted regular monthly payments to Movant but fell ill and was unable to submit payments recently. Said missed payments were not for three consecutive monthly payments but rather sporadically over recent months. Debtor wishes to enter into a stipulation with Movant to resolve the matter.
8. Denied. Debtor has submitted an additional payment that was not accounted for on Movant's post-petition payment history.
9. Admitted.
10. This averment does not require an answer. Debtor's counsel does agree that Movant may send communications to offer and provide information with regard

to a potential Forbearance Agreement, Loan Modification, Refinance Agreement, Loss Mitigation Agreement or other Loan Workout may be sent directly to Debtor. Any other communications should be sent to counsel for Defendant.

11. Admitted.

Wherefore, Respondent respectfully requests this Honorable Court deny Movant's Motion and allow Movant and Debtor to enter into a stipulation to bring the loan current.

Date: December 1, 2020

/s/ Aaron J. Neuharth
Aaron J. Neuharth
Attorney for Debtor
Supreme Ct. No.: 88625
PO Box 359
Chambersburg, PA 17201
(717)264-2939